

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC,
et al.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

Case No. 1:23-cv-10766-JSR

GIRARD STREET INVESTMENT
HOLDINGS LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

Case No. 1:23-cv-10772-JSR

GIRARD STREET INVESTMENT
HOLDINGS LLC,

Plaintiff,

v.

PDV HOLDING, INC.,

Defendant.

Case No. 1:24-cv-04448-JSR

**DEFENDANT PDVSA PETRÓLEO, S.A.'S UNOPPOSED JOINDER IN DEFENDANTS
PDV HOLDING, INC. AND PETRÓLEOS DE VENEZUELA, S.A.'S RESPONSE TO
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Defendant PDVSA Petróleo, S.A. (“PPSA”) files this unopposed joinder in Defendants PDV Holding, Inc. (“PDVH”) and Petróleos de Venezuela, S.A.’s (“PDVSA”) Response to Plaintiffs’¹ Motion for Summary Judgment.

Plaintiffs moved for summary judgment on Counts I and II against PDVSA and PPSA and on Count III against PDVH. *See* Dkt. No. 165.² On April 2, 2025, PDVH and PDVSA filed a response, in which they jointly opposed Plaintiffs’ motion on Counts I, II, and III, *see* Dkt. 215, 217 and 221–22³ (the “Response”). PPSA intended to join the Response to oppose Counts I and II only. *See, e.g.*, Dkt. 217 at ¶¶ 130, 142 (disputing legal conclusion regarding PPSA’s payment obligations under note agreements and citing to Dkt. 215 at 37–40).

However, due to an administrative error, PPSA was inadvertently omitted from the Response captions and signature blocks. To correct this administrative error, PPSA now joins the Response and respectfully requests that Plaintiffs’ motion for summary judgment on Counts I and II be denied for the reasons set forth in the Response.

¹ Girard Street Investment Holdings LLC is the plaintiff in Nos. 23-cv-10772 and 24-cv-4448. The seven entities enumerated G&A Strategic Investments I–VIII, LLC are the plaintiffs in No. 23-cv-10766.

² Citations to docket numbers are only to those in *G&A Strategic Investments I LLC, et al. v. Petróleos de Venezuela, S.A., et al.*, 23-cv-10766 (S.D.N.Y.).

³ Pursuant to the Court’s Order, *see* Dkt. 141, Defendants initially filed the Response under seal and subsequently filed a public version of the Response. *See* Dkt. 221–22.

Dated: April 16, 2025

Respectfully submitted,

By: /s/ Camilo Cardozo

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Petróleos de Venezuela, S.A. and PDVSA Petróleo,
S.A.

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, a copy of the foregoing **Defendant PDVSA Petróleo, S.A.’s Unopposed Joinder in Defendants PDV Holding, Inc. and Petróleos de Venezuela, S.A.’s Response to Plaintiffs’ Motion for Summary Judgment** was filed and caused to be served upon noticed outside counsel for Plaintiffs G&A Strategic Investments I LLC, G&A Strategic Investments II LLC, G&A Strategic Investments III LLC, G&A Strategic Investments IV LLC, G&A Strategic Investments V LLC, G&A Strategic Investments VI LLC, G&A Strategic Investments VII LLC, and Girard Street Investment Holdings LLC via electronic mail.

/s/ Camilo Cardozo